

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

ORIGINAL
FILE

In the Matter of

Amendment of Parts 2 and 97
of the Commission's Rules
Regarding Allocation of
the 216-220 MHz Band for the
Amateur Services

TO: The Commission

RM-7747

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**COMMENTS OF
WATERWAY COMMUNICATIONS SYSTEM, INC.**

Waterway Communications System Inc. ("WATERCOM"), by its attorney, respectfully herewith submits its Comments concerning the Petition of the American Radio Relay League ("ARRL") seeking the initiation of rulemaking to permit the Amateur Service to operate in the 216-220 MHz band for point-to-point fixed communications, on a secondary basis to the Maritime Mobile Service.^{1/}

I. INTRODUCTORY STATEMENT

1. WATERCOM operates an Automated Maritime Telecommunications System (AMTS) on frequencies in the 216-220 MHz band along the Mississippi, Illinois and Ohio Rivers

^{1/} Public Notice of the Petition for Rulemaking was given by the Commission on June 24, 1991 (Report No. 1850). The

and the Gulf Intracoastal Waterway. The WATERCOM system is an integrated, automated, interconnected telecommunications system providing full duplex telephony, data and facsimile services to vessels operating along the 4000 miles of inland and coastal waterways which constitute the principal water transportation network of the United States. WATERCOM thus has a substantiate interest in the allocation and use of the 216-220 MHz frequency band.

II. COMMENTS

2. The ARRL postulates that the Amateur Service can operate point-to-point communication services on a secondary basis to the Maritime Mobile Service at 216-220 MHz, and so seeks such an allocation. The ARRL premises its ability to operate on a non-interference basis upon certain engineering characteristics for the Maritime Mobile and other services presently allocated to use the 216-220 MHz band, as set forth in Exhibit B to its Petition.

3. The engineering values set forth in Table 3 of Exhibit B understate the operational characteristics of the AMTS, as operated by WATERCOM, with regard to five separate values.^{2/} The erroneous assumptions of the AMTS

^{2/} Table 3 of Appendix B to the Petition sets forth

characteristics tend to understate the susceptibility of AMTS to interference from Amateur operations. Accordingly, the separation needed between AMTS operations and Amateur service stations is much greater than that specified in the Petition.^{3/} Moreover, separation requirements apply to adjacent channels as well as co-channel operations.

4. WATERCOM accepts that, with appropriate separations between AMTS operations and Amateur Service stations, the Amateurs can utilize 216-220 MHz band frequencies without causing harmful interference to AMTS operations. The appropriate procedure for handling the separations requirements is through the frequency coordination process.^{4/} An effective frequency coordination process also would provide a database of licensees and their

^{2/}(...continued)
operations. AMTS is the Maritime Mobile system operating in the 216-220 MHz band. The erroneous assumptions of characteristics regarding AMTS operations are emission designator, with regard to both bandwidth and categories of service, antenna gain, sensitivity, antenna type and antenna height.

^{3/} See Petition at ¶ 37.

^{4/} WATERCOM endeavored to address the separation requirements with ARRL's technical representatives prior to filing these Comments; however, the individual primarily responsible for said issues within ARRL was traveling abroad and unavailable to resolve these issues in timely fashion for the preparation and filing of these Comments. WATERCOM believes that the distance separations issues can be resolved on an amicable basis with the ARRL.

locations, not otherwise available from the Commission's
~~licensing records with regard to the Amateur Service to~~

recognized as representative of the Amateur community at large. WATERCOM respectfully submits that the interests of all parties best will be served by establishing an effective, mandatory frequency coordination process managed by the ARRL.^{7/}

6. In summary, WATERCOM believes that the Amateur Service successfully can use 216-220 MHz band frequencies on a non-interference basis to Automated Maritime Telecommunications Systems. The key to such compatible usage is, of course, effective frequency coordination. Accordingly, WATERCOM requests the Commission, should it proceed with the secondary allocation requested by the ARRL, to impose frequency coordination requirements on Amateur operations in the 216-220 MHz band.


^{7/} If the Commission declines to establish a mandatory frequency coordination process, WATERCOM respectfully submits that any party conducting its own frequency analysis should be required, in conjunction with licensing in the 216-220 MHz band or prior to commencement of operation on a new channel at any particular location, to provide notice of such commencement of operation both to the ARRL and also to AMTS licensees if within 300 miles of a coastal area or navigable waterway served by AMTS. Notice to the ARRL is necessary to allow that organization to maintain its database. Notice to AMTS licensees is consistent with the requirement of Section 80.475(b)(2) that an AMTS applicant must notify adjacent band television channel 13 licensees of its applications. If direct notice to adjacent band licensees is appropriate, notice to primary licensees within the band is a necessary and beneficial measure.

WHEREFORE, THE PREMISES CONSIDERED, Waterway Communications System, Inc., respectfully urges the Federal Communications Commission to act consistent with the foregoing views and recommendations with regard to the disposition of the above-captioned Petition for Rulemaking.

Respectfully submitted,

**WATERCOM COMMUNICATIONS
SYSTEM, INC.**

By


Martin W. Bercovici
KELLER AND HECKMAN
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
(202) 434-4144

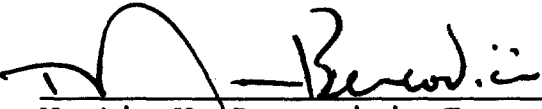
Its Attorney

Date: October 23, 1991

CERTIFICATE OF SERVICE

I, Martin W. Bercovici, hereby certify to serving,
on this date, a copy of the foregoing "Comments of Waterway
Communications System, Inc.," by United States first-class
mail, postage prepaid upon the following parties:

Christopher D. Imlay, Esquire
Booth, Freret & Imlay
1920 M Street, N.W.
Suite 150
Washington, D.C. 20036



Martin W. Bercovici, Esq.

October 23, 1991

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